

## Summary of Public Comments

	Summary of Comment	South Dakota's Response
1	<p>Two stakeholders expressed concern with the following:</p> <ul style="list-style-type: none"> <li>Requirement for Medicaid providers for Structured Family Caregiving to be on-call and provide emergency backup 24/7</li> <li>Requirement for monthly face-to-face visit or virtual visit, noting the potential lack of internet access as a challenge.</li> </ul>	<p>South Dakota agrees with the comments and has modified the amendment with the following language:</p> <ul style="list-style-type: none"> <li>The Medicaid enrolled provider agency must be accessible during normal business hours and coach a caregiver to manage urgent and emergency situations in the home and, in conjunction with the principal caregiver and the waiver case manager, establish an emergency back-up plan for instances when the caregiver is unable to provide care.</li> <li>The Medicaid enrolled provider agency must conduct a care conference (on-site or virtual) on a monthly basis with the participant and principal caregiver. At least one care conference must be conducted as an on-site face to face visit on an annual basis with the participant and principal caregiver. The provider must establish the frequency of on-site face to face care conferences throughout the year based on the assessed needs of the participant and family.</li> <li>Recommendations specific to the frequency of additional visits will be addressed in the Supplemental Agreement rather than the waiver application.</li> </ul>
2	<p>One provider questioned if provider agencies will continue to be able to hire family members to provide services and receive a wage for doing so.</p>	<p>Agencies will continue to be able to hire family members in compliance with policies to be established by the Division of Long Term Services and Supports.</p>

3	One provider questioned whether the Structured Family Caregiving Medicaid enrolled provider agency would be required to serve statewide.	Yes, the Structured Family Caregiving Medicaid enrolled provider agency will be required to serve statewide. This clarification was added to the provider requirements.
4	Three stakeholders submitted a letter of support for the new services being included in the waiver amendment.	South Dakota appreciates support from stakeholders.
5	One stakeholder recommended clarifications to the Structured Family Caregiving service definition and provider standards and qualifications.	<p>South Dakota appreciates the recommendations and has modified the amendment with the following:</p> <ul style="list-style-type: none"> <li>• Language that clarifies that the waiver participant's relative or non-relative fictive kin may also own lease or rent the home</li> <li>• Addition of the requirement for the provider agency to assess the home setting principal caregiver and other individual living in the structured family caregiving home in order to ensure safety, accessibility, comfort and privacy for the participants receiving care and to establish a plan for educating, supporting and coaching the caregiver.</li> </ul> <p>Recommendations specific to assessment and documentation requirements will be addressed in the Supplemental Agreement rather the waiver application.</p>
6	<p>One stakeholder recommended the following modifications to the Waiver amendment language:</p> <ul style="list-style-type: none"> <li>• Identify that caregiver and coaching is an essential component of the service design</li> <li>• Allow providers to adopt a flexible, person-centered approach to face-to-face home visits</li> </ul>	South Dakota agrees with these comments and has modified the amendment accordingly
7	One stakeholder recommended the State eliminate references to matters that are best addressed in State program rules	<p>South Dakota appreciates the recommendations and has eliminated references that the State agrees are best addressed in State program rules including:</p> <ul style="list-style-type: none"> <li>• Requirement for background checks for all</li> </ul>

		<p>adults living in the home will be addressed in the Supplemental Agreement rather the waiver application</p> <p>SD has retained references that the State considers necessary Including:</p> <ul style="list-style-type: none"> <li>• Licensure requirement when SFC service is being provided by a non-relative/fictive kin</li> </ul>
8	One stakeholder requested the State utilize a staff ratio of a 1:1 versus 1:2 to establish the rate for Structured Family Caregiving	The rate methodology utilizes a 1:2 because Structured Family Caregiving homes are anticipated to serve two individuals.
9	Several individuals expressed interest in participating in the new residential options.	South Dakota thanks them for their interest.
10	One stakeholder expressed concern regarding the reimbursement rate for Medicaid recipients residing in assisted living settings	Following the submission of this comment, the SFY 2019 budget approved by the South Dakota Legislature included funding to support an increase to 90% of methodology costs and a 2% inflationary increase in HOPE waiver assisted living reimbursement rates for SFY 2019.
11	One stakeholder identified the importance of continuing to support existing nursing facilities and assisted living centers as we work to expand home and community-based services	South Dakota appreciates this comment and agrees that there is a continued need for both nursing facilities and home and community-based settings in order to meet the needs of all South Dakotans accessing long term services and supports.